

THE CANNABIS CONNECTION

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Division of Cannabis Regulation (DCR)*





MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Division of Cannabis Regulation



MAY 2025

STREET TUNING CON

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CHECKING IN WITH TRU

Interview with Ryan Bernard

Author: Tara McKinney
Public Outreach Director

Ryan Bernard joined the DCR staff in December 2024. He brings a wealth of experience to his role as unit manager for the Testing and Research Unit (TRU) within the Section for Compliance and Enforcement.

Ryan has a bachelor's degree in chemistry and a master's degree in business administration. His professional experience includes leading teams and managing projects in both scientific and regulatory environments.

TRU is responsible for ensuring testing licensees are in compliance through inspections, monitoring statewide track and trace system reviews, education and violation issuance and resolutions. TRU collaborates with all stakeholders in DCR to enhance the safety of Missouri's cannabis products.



“Who is involved with TRU?”

Ryan:

TRU has two compliance officers, Jamie Minter and Paige Welschmeyer, working to evaluate laboratory methodologies and testing results and providing guidance to testing licensees on compliance issues or concerns. TRU also has a research scientist assisting with ongoing research and development for DCR. This position supports regulatory standards while fostering innovation and building both internal and customer confidence in DCR.

“What are your main priorities over the next year for the unit?”

Ryan:

My primary focus for TRU is working with the compliance officers in conducting ongoing performance inspections of certified testing licensees to ensure compliance with 19 CSR 100-1. Additionally, I'm collaborating with the Missouri State Public Health Laboratory to facilitate the successful integration of the DCR Reference Lab. Another key priority is providing support to DCR by addressing science, technology, engineering and mathematics (STEM) related questions and concerns, leveraging scientific research and technical expertise to enhance decision making.

“What are some common testing problems that you see within the industry?”

Ryan:

A common issue is equipment failures, which create major challenges for licensed facilities and disrupt operations. Additionally, TRU has observed that some new cannabis products entering the market are not compatible with current testing methodologies used by licensed laboratories.

Need to reach out to TRU? Email TestingandResearchUnit@health.mo.gov or give them a call at 866-219-0165.

Holds & Recalls

**Author: Megan Bailey, Supervisor
Track and Trace Unit**



“Administrative Hold” is defined by DCR as a status given to marijuana product by the department that prohibits any activity with the marijuana product including waste, sale or transfer of the marijuana product until the hold is lifted.

Administrative holds are placed when staff first identify the product(s) that may pose a threat to public health and safety. This can be for many reasons, including not testing items in accordance with rule, not properly tracking product in the statewide track and trace system, not listing all ingredients, providing false and misleading information to the public or failed mandatory testing.

Administrative hold can be placed on marijuana product, associated product or product made from marijuana product. Once the hold is placed, an investigation is conducted to determine if the marijuana product is safe, may be remediated or must be destroyed.

A public notice of recall may be issued if DCR cannot verify compliance with health and safety requirements. Additional information regarding public notices may be found at <https://health.mo.gov/safety/cannabis/pdf/public-marijuana-product-recalls081624.pdf>

If it is determined that the marijuana product is not a threat to health and safety, the product will be released from administrative hold. However, if it is determined there is a threat to public health and safety, the marijuana product may be required to be destroyed or may be released for remediation.

To ensure marijuana product that is on administrative hold is not sold or distributed to patients and consumers, dispensary licensees must verify through the statewide track and trace system that the marijuana product is not

been placed on hold, recalled, ordered or other required to be destroyed per 19 CSR 100-1.180(2)(B)2.

DCR provides options for licensees with marijuana product on administrative hold. A licensee may submit a request to:

- Transfer marijuana product on administrative hold to another licensed facility for quarantine and storage.
- Voluntarily destroy marijuana product on administrative hold.

As voluntary destruction and transfer requests are processed, it may cause marijuana product to be released from administrative hold and then the administrative hold reinstated as child packages are sometimes affected. DCR is continually working to improve and refine these processes. Licensees should check the recall list, if applicable, to verify marijuana product may be processed after being placed on administrative hold.

Licensees avoid unassociated marijuana product being placed on administrative hold and/or recalled by following these tips:

- 1. Do not transfer source tags from originating facility.** Source tags should be kept with the originating licensee's inventory, including those from which mandatory testing samples have been taken or transfer/sale packages have been created. By following this process, the licensee maintains traceability and lessens the effect other licensees may have on product should they be involved in a recall.

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Holds & Recalls, continued

For example, a cultivation licensee transfers the remaining package weight to a manufacturing licensee for processing after prepacks are created. All marijuana product at that manufacturer is placed on administrative hold or recalled. All child packages that were created by the cultivation licensee from the same tag may be inadvertently placed on administrative hold or recalled.

- 2. Limit re-work, like further processing of waste (tails).** By limiting the number of batches where re-work is used, a licensee can avoid locking up batches that may contain trace amounts of the potentially contaminated product.

For example, a manufacturing licensee takes the remnants from each distillate batch and re-packages it with the next batch of distillate to utilize every bit of product. One of the cultivation licensees from which biomass is received has all marijuana product placed on administrative hold for possible illegal pesticide usage. The original batch of distillate created from the biomass is placed on administrative hold, and every tag created since that batch will also now be placed on administrative hold because all tags show that remnants have been added in every batch. By limiting the number of batches leftover distillate is added to, a licensee is stopping that chain and can limit the number of tags getting inadvertently put on hold.

- 3. Using production batches correctly and following the requirement of mandatory testing for final marijuana product** may assist a licensee to avoid tags inadvertently being placed on administrative hold.

For questions, please contact the assigned compliance officer or CannabisCompliance@health.mo.gov. Licensees may find additional information on our website: <https://health.mo.gov/safety/cannabis/recalls.php>.

Micro Message

Be a Rule Follower

Author: Lesley Turek, Chief Equity Officer

The most important responsibility for all microbusiness licensees is to know the rules and regulations required for compliance in 19 CSR 100.

Microbusiness facilities must understand and follow every regulation that is applicable to DCR-licensed facilities held within the entirety of those rules. It's a good idea to read every applicable section and highlight or mark the regulations that apply directly to your licensed facility.

Don't understand something in rule? Reach out to your assigned compliance officer with any questions. DCR has amazing, knowledgeable staff members who are willing to be a resource for licensed microbusiness facilities as they navigate the regulations.

If you need an electronic copy of 19 CSR 100, visit DCR's website at cannabis.mo.gov to download a pdf of the final rules which went into effect on July 30, 2023.

What if you still have questions? First, reach out to your assigned compliance officer with any questions or concerns. If you still need help or don't know who your compliance officer is, feel free to contact me by email at lesley.turek@health.mo.gov or by phone at 573-522-1792.

Keeping Compliant

Author: Bruce Dooley, manager, Facility Compliance Unit

When planning or participating in festivals and events this spring and summer, it is important to ensure that the event and licensees involved remain in compliance. The first thing to remember is that department rules (19 CSR 100-1) apply during an event just as they do any other day. To help with planning, this article highlights a few key points and regulations to keep in mind. DCR recommends reviewing the [Facility Communications and Guidance webpage](#) for important details.

Licensees are responsible for ensuring all participants, including outside parties, are aware of what is allowed and taking measures to prevent, address and report violations. For all events, be sure to review expectations with other vendors and provide guests with information before participating. Licensees organizing events are subject to penalties for any violations of department rules that occur at that event per 19 CSR 100-1.020(3)(E).

Any transaction of marijuana product (which includes those where the cost is waived) is still considered distribution, which may only be done by a licensed dispensary. Cultivation and manufacturing licensees must transfer product to a dispensary for it to be distributed to patients, primary caregivers and consumers.

If dispensary licensees plan to have transactions occur, they must consider how this can be compliantly conducted. See 19 CSR 100-1.180(2)(D) for rules related to transactions.

Some important rules to note:

- ✓ Every transaction order must come directly from the consumer, patient or primary caregiver in person, by phone or online.
- ✓ Marijuana product cannot leave the facility before a dispensary licensee receives payment, unless it is for a delivery.
- ✓ Deliveries are limited to two individuals at the same address on the same day, if not pre-paid.
- ✓ Marijuana product that has not been purchased cannot be stored outside of the licensed premises and their approved spaces.

Dispensary licensees must maintain a one (1) facility agent to three (3) consumers, qualifying patients, primary caregivers or combined ratio in the limited access area where marijuana product is available. See 19 CSR 100-1.180(2)(A)3.

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Keeping Compliant continued

Consumption of marijuana product on the licensed premises is prohibited, even during an event, per 19 CSR 100-1.100(4)(M). The definition of a facility's premises according to department rules includes the physical structure(s), including strip malls, and the property on which the physical structures are located which are used by a licensed or certified entity to perform its licensed or certified functions. This may include the parking lot or similar areas if included in the licensed premises.

In addition, licensees should be aware of all local regulatory requirements. The rules noted above are not a comprehensive compliance list you should be aware of before scheduling and holding a facility event or giving away marijuana product. There is no scenario where a licensee or agent ID holder working for a licensee may give away, sell or otherwise distribute marijuana to anyone unless they are doing so in an approved area of the dispensary facility and each individual person and product is entered into statewide track and trace system (Metrc) appropriately.

If you have specific questions related to event compliance, please contact the assigned compliance officer or cannabiscompliance@health.mo.gov.

DCR Call Center FAQs: Agent ID applications

How long does it take to process Agent ID applications? Why does it take more time after I've submitted my fingerprints?

DCR processes Agent ID applications daily and prioritizes processing as expediently as possible, though there is no constitutional deadline associated with processing agent applications. Since criminal history record results can sometimes take upwards of 2 weeks from the time fingerprints are submitted until the results show in MACHS for us to process, we cannot guarantee processing times.

Here are some standard reminders for Agent ID applications:

- All applications are processed in the order in which they are received.
- We process them as quickly as we are able; although, there is no constitutional deadline requiring DCR to process agent applications within a specific timeframe.
- Background check results will often add to processing times while fingerprints are processed and results uploaded to the MACHS portal. DCR does not have control of timelines related to fingerprint processing in the MACHS portal.
- A status in Complia (the online registry portal) of "submitted" indicates that the application is received and being processed, though applicants are welcome to check-in while their application is in "submitted" status to confirm the application is being processed, it will not change processing times.
- DCR primarily communicates with applicants through email. Applicants should monitor their email inbox for notifications that their application has been processed.

I have previously submitted my fingerprints; do I need to submit them again?

Yes. As part of the FBI's approval of the department's statutory authority to review state and federal criminal background records, DCR has received a new four-digit code for fingerprint submissions, making the code utilized under the medical program no longer valid. The previous fingerprints results are not usable.

Meet our team

WE ARE DCR

Shayna Arndt

Director, Section for Patient and Application Services

I've been an enthusiastic member of DCR since December 2019. I started in the call center and grew along with the program when we transformed into DCR. During that time, the patient services team became the Section for Patient and Application Services (PAAS). I've been proud to serve Missourians in different capacities in these five years, including being recently promoted to section director.

Long before my tenure working with DHSS, I received a BS in Business Marketing from Missouri State while simultaneously starting my career in professional foodservice management with one of the "big three" companies in the land of contract food service. The 8-year journey provided me with many learning and growth opportunities, much perspective and the opportunity to travel and work remote before it was cool. Though the work was exciting and fast-paced, ultimately my heart brought me back to home to Missouri to be with family.

I found myself being called to look for ways that my past career experience could serve my community. I was subsequently thrilled for the opportunity to join the medical marijuana regulation program shortly after the vote passed. Learning within DCR is never done, but I look forward to taking on new challenges, ensuring safe access to marijuana is carried out ethically, fairly, reasonably and with the future always in mind.



Robyn May

Manager, Facility Applications Services, Section for Patient and Application Services



I have had the pleasure of being part of DCR since May 2019, starting my journey with the patient services team under the medical marijuana regulation program. My, oh my, how much has changed. Thinking back on those first couple of years, I was a part of navigating emergency rules, acclimating to new systems, opening the call center, working with Missourians to educate on rule and law, and answering the ever-remaining question of 'how to apply'. I've gained immense knowledge by observing leadership and staff, as well as gleaned lessons from processes and practices that have proven effective.

This experience has helped to shape not only myself, but the Facility Applications Services Unit (FAS) and our processes to date. I am beyond proud of the work FAS continues to produce and the impact each team member provides. I look forward to what lies ahead for DCR and our ever-changing role as leaders, regulators and trailblazers continuing to set standards to pave our own path. When I am not working,

I keep it pretty chill and enjoy spending my time at home with my crazy cats and pupper-dog or hanging out with my family.

Meet our team

WE ARE DCR

Bruce Dooley

Manager, Facility Compliance Unit, Section for Compliance and Enforcement

I have been serving Missourians since enlisting in the U.S. Marine Corps in 2008. I served as a Sheriff's Deputy with Boone County from 2012 to 2015. I obtained my bachelor's degree in sociology from the University of Missouri and Columbia College and began working for the Missouri Department of Social Services (DSS) in January 2021.

At DSS, I managed the child care subsidy unit as it transitioned to the new Office of Childhood under the Department of Elementary and Secondary Education (DESE) in 2022. While in this position, I assisted with the rollout of childcare relief funds following COVID. I brought my regulatory expertise to DCR in June 2023 as the facility compliance manager and have been excited to participate in the development of a rapidly evolving program.

When I am not working, or working around my house, you will find me playing games, watching movies or going on adventures with my family, friends, and pets.



Virtual

Licensee Learning Sessions

June 24, 2025

Two sessions: same great content!

Register for the session that works best for your schedule.

Morning (9-11 a.m.) or Afternoon (1-3 p.m.)

Registration is required to attend.

Registrants should be a member of ownership, facility management, compliance staff or any other staff to which the session topics apply.

Questions?

CannabisDevelopment@health.mo.gov

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Check out our [monthly podcast](#) to hear about what's happening around DCR! If you have a topic that you would like us to feature reach out to Tara McKinney at tara.mckinney@health.mo.gov.

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